The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ZANGO, INC., Plaintiff, v. PC TOOLS PTY, LTD., Defendant.	NO. 07-CV-00797 JCC DECLARATION OF TOM ALLAN IN OPPOSITION TO PC TOOLS' MOTION TO DISMISS

I, Tom Allan, declare as follows:

1. I am the Director of Finance for plaintiff Zango, Inc. My responsibilities as Director of Finance include, among other duties, revenue analysis and forecasting. I make this declaration based upon my personal knowledge.

2. Zango's has lost more than 143,000 customers in the United States in recent months. This is based on a comparison of the seven-day average for the week of March 29, 2007 as compared to the week of June 17, 2007. I know of no market-based reason for this decline. Rather, I believe it to be attributable to the interference with our software applications by PC Tools and a few other anti-spyware companies.

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3. I am aware that Derek Immekus has separately calculated that there are more than 53,000 Zango customers in the State of Washington. I believe that this substantial Washington presence has been harmed by PC Tools to the same extent as Zango's customer base in other states. Stated another way, I know of no reason why the harm done by PC Tools to Zango would occur exclusively outside the state of Washington.

4. My belief is reinforced by the volume of Spyware Doctor downloads in Washington state. I understand PC Tools claims that Washington resident constitute .07 percent of total downloads from PC Tools' web site, and that PC Tools claims a total of 100 million downloads (thus meaning that perhaps as many as 70,000 Washington residents have downloaded Spyware Doctor). I do not believe it possible that PC Tools Spyware Doctor is not affecting the 53,000 Zango customers in Washington.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 18th day of June, 2007, at Seattle, Washington.

s/ Tom Allan
Tom Allan

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

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